

## Example #1 - Hand Wipe Cleaning Recordkeeping Form

Plant Name: \_\_\_\_\_ Shop: \_\_\_\_\_ Supervisor: \_\_\_\_\_

**Record info in Bold**

*Report info in italics semi-annually*

*Example 1*

*Example 2*

*Example 3*

Inventory Date	1/1/98	1/1/98	1/1/98			
Operation Performed	General aircraft cleaning	General aircraft cleaning	General aircraft cleaning			
Exempt or non-exempt activity <sup>1</sup>	non-exempt	non-exempt	non-exempt			
Solvent Used <sup>2</sup>	<b>Aircraft Thinner Type A</b>	<b>General Purpose Cleaner</b>	<i>Aircraft Thinner Type C</i>			
Manufacturer	Thinner USA	We Be Clean Inc.	Thinner USA			
Source of HAP Constituents	MSDS T    Testing 9	MSDS T    Testing 9	MSDS T    Testing 9			
Organic HAP Constituents include % of each HAP	MEK	3	MEK	60	MEK	5
	MIBK	7	MIBK	3	MIBK	30
			Toluene	15	Xylene	24
					Toluene	3
Aqueous solvent % water\$80 Miscible with water Flash point >200 EF	Yes T    No 9 <b>85</b>	Yes 9    No T    ____	Yes 9    No T    ____			
	<b>Yes</b> T    No 9 <b>210</b>	Yes 9    No T    ____	Yes 9    No T    ____			
	Yes T    No 9 <b>210</b>	Yes 9    No T    ____	Yes 9    No T    ____			
Hydrocarbon based solvent VP# 7 mmHg@20EC Photochemically reactive or Oxygenated No HAP	Yes 9    No T    ____	Yes 9    No T    ____	Yes 9    No T    ____			
	Yes 9    No T    ____	Yes 9    No T    ____	Yes 9    No T    ____			
	Yes 9    No T    ____	Yes 9    No T    ____	Yes 9    No T    ____			
	Yes 9    No T    ____	Yes 9    No T    ____	Yes 9    No T    ____			
Composite Vapor Pressure # 45 mmHg@20EC <sup>3</sup> (Option 2)	Yes T    No 9 <b>10</b>	Yes T    No 9 <b>30</b>	Yes 9    No T <b>49.1</b>			
Compliance Method <sup>4</sup>	Option 1 (aqueous)	Option 2 (vp)	<i>non-exempt, non-compliant</i>			
Material usage (in gallons)	Actual T    Purchase 9	Actual 9    Purchase T	Actual T    Purchase 9			
January	25	5				
February	83	3				
March	17	7	15 (3/23/98)			
April	55	3	12 (8/1/98)			
May	77	7				
June	89	1	2 (2/21/98)			
July	59	3				
August	139	5	Report any instance where			
September	150	7	non-compliant, non-exempt			
October	25	1	solvent is used			
November	66	3				
December	21	1				

<sup>1</sup> Exempt operations that do not conform to VP or composition requirements must be reported. See back of form for list of exempt operations.

<sup>2</sup> keep a record of the solvent name, VP, and organic HAP constituents as required in 63.752(b)(1), general cleaning. MSDSs or Product Data Sheets can be used.

<sup>3</sup> See back of form for calculating composite vapor pressures.

<sup>4</sup> Option 3 (solvent reduction >60%) requires submission of an alternate plan (ä63.477(b)(3))

Yearly Total (gals)	806	46	29
---------------------	-----	----	----

<sup>1</sup> Exempt operations that do not conform to VP or composition requirements must be reported. See back of form for list of exempt operations.

<sup>2</sup> keep a record of the solvent name, VP, and organic HAP constituents as required in 63.752(b)(1), general cleaning. MSDSs or Product Data Sheets can be used.

<sup>3</sup> See back of form for calculating composite vapor pressures.

<sup>4</sup> Option 3 (solvent reduction >60%) requires submission of an alternate plan (ä63.477(b)(3))

## Example #1 - Hand Wipe Cleaning Recordkeeping Form (cont'd)

Be aware that if you use a non-compliant solvent on an exempt operation, you must document the amount of each cleaning solvent used each month at each operation. You must also list the process to which the cleaning operation applies.

**What operations are exempt from hand wipe cleaning requirements?** Exemptions include cleaning of . . .

- ' breathing oxygen systems exposed to breathing oxygen
- ' parts exposed to strong oxidizes or reducers
- ' surface activation prior to adhesive bond
- ' electronic parts and assemblies containing electronic parts
- ' aircraft and ground support equipment fluid systems that are exposed to fluid
- ' fuel cells, fuel tanks, and confined spaces
- ' solar cells, coating optics, and thermal control surfaces
- ' upholstery, curtain, carpet and other textiles used in the interior of the aircraft
- ' metallic and non-metallic materials used in honeycomb cores
- ' aircraft transparencies, polycarbonate, or glass substrates
- ' Cleaning associated with research and development, quality control and laboratory testing
- ' Cleaning using nonflammable liquid conducted within 5 feet of energized electrical systems
- ' Cleaning operations identified as essential use under the Montreal Protocol

**How do I calculate composite vapor pressure?**

**For single component solvents:** Calculate VP using the solvents' MSDS, other manufacturing data, standard engineering reference texts or other methods.

**For blended solvents:** If your solvent contains more than one HAP, calculate VP using the following equation: (or use test method ASTM E-260-91). 1 lb = 453.6 grams

$$PP_c = \sum_{i=1}^n \frac{(W_i)(VP_i)/MW_i}{\frac{W_w}{MW_w} \% + \sum_{e=1}^n \frac{W_e}{MW_e} \% + \sum_{i=1}^n \frac{W_i}{MW_i}}$$

Description	
$W_i$	weight of the "i"th VOC compound, grams
$W_w$	weight of water, grams
$W_e$	weight of non-HAP, non-VOC compounds, grams
$MW_i$	molecular weight of the "i"th compound, g/g mole
$MW_w$	molecular weight of water, g/g mole
$MW_e$	molecular weight of exempt compound, g/g mole
$PP_c$	VOC composite partial pressure at 20EC, mm Hg
$VP_i$	Vapor pressure of the "i"th VOC compound at 20EC, mm Hg

## Example #1 - Hand Wipe Cleaning Recordkeeping Form

Plant Name: \_\_\_\_\_

Shop: \_\_\_\_\_

Supervisor: \_\_\_\_\_

Inventory Date						
Operation Performed						
Exempt or non-exempt activity <sup>1</sup>						
Solvent Used <sup>2</sup>						
Manufacturer						
Source of HAP Constituents	MSDS 9	Testing 9	MSDS 9	Testing 9	MSDS 9	Testing 9
Organic HAP Constituents include % of each HAP						
Aqueous solvent % water\$80	Yes 9	No 9	___	Yes 9	No 9	___
Miscible with water	Yes 9	No 9	___	Yes 9	No 9	___
Flash point >200 EF	Yes 9	No 9	___	Yes 9	No 9	___
Hydrocarbon based solvent VP# 7 mmHg@20EC	Yes 9	No 9	___	Yes 9	No 9	___
Photochemically reactive or	Yes 9	No 9	___	Yes 9	No 9	___
Oxygenated	Yes 9	No 9	___	Yes 9	No 9	___
No HAP	Yes 9	No 9	___	Yes 9	No 9	___
Composite Vapor Pressure # 45 mmHg@20EC <sup>3</sup> (Option 2)	Yes 9	No 9	___	Yes 9	No 9	___
Compliance Method <sup>4</sup>						
Material usage (in gallons)	Actual 9	Purchase 9		Actual 9	Purchase 9	
January						
February						
March						
April						
May						
June						
July						
August						
September						
October						
November						
December						
Yearly Total (gals)						

<sup>1</sup> Exempt operations that do not conform to VP or composition requirements must be reported. See back of form for list of exempt operations.

<sup>2</sup> keep a record of the solvent name, VP, and organic HAP constituents as required in 63.752(b)(1), general cleaning. MSDSs or Product Data Sheets can be used.

<sup>3</sup> See back of form for calculating composite vapor pressures.

<sup>4</sup> Option 3 (solvent reduction >60%) requires submission of an alternate plan (ä63.477(b)(3))

## Example #1 - Hand Wipe Cleaning Recordkeeping Form (cont'd)

Be aware that if you use a non-compliant solvent on an exempt operation, you must document the amount of each cleaning solvent used each month at each operation. You must also list the process to which the cleaning operation applies.

**What operations are exempt from hand wipe cleaning requirements?** Exemptions include cleaning of . . .

- ' breathing oxygen systems exposed to breathing oxygen
- ' parts exposed to strong oxidizes or reducers
- ' surface activation prior to adhesive bond
- ' electronic parts and assemblies containing electronic parts
- ' aircraft and ground support equipment fluid systems that are exposed to fluid
- ' fuel cells, fuel tanks, and confined spaces
- ' solar cells, coating optics, and thermal control surfaces
- ' upholstery, curtain, carpet and other textiles used in the interior of the aircraft
- ' metallic and non-metallic materials used in honeycomb cores
- ' aircraft transparencies, polycarbonate, or glass substrates
- ' Cleaning associated with research and development, quality control and laboratory testing
- ' Cleaning using nonflammable liquid conducted within 5 feet of energized electrical systems
- ' Cleaning operations identified as essential use under the Montreal Protocol

**How do I calculate composite vapor pressure?**

**For single component solvents:** Calculate VP using the solvents' MSDS, other manufacturing data, standard engineering reference texts or other methods.

**For blended solvents:** If your solvent contains more than one HAP, calculate VP using the following equation: (or use test method ASTM E-260-91). 1 lb = 453.6 grams

$$PP_c = \sum_{i=1}^n \frac{(W_i)(VP_i)/MW_i}{\frac{W_w}{MW_w} \% + \sum_{e=1}^n \frac{W_e}{MW_e} \% + \sum_{i=1}^n \frac{W_i}{MW_i}}$$

Description	
$W_i$	weight of the "i"th VOC compound, grams
$W_w$	weight of water, grams
$W_e$	weight of non-HAP, non-VOC compounds, grams
$MW_i$	molecular weight of the "i"th compound, g/g mole
$MW_w$	molecular weight of water, g/g mole
$MW_e$	molecular weight of exempt compound, g/g mole
$PP_c$	VOC composite partial pressure at 20EC, mm Hg
$VP_i$	Vapor pressure of the "i"th VOC compound at 20EC, mm Hg